

Remarks

In furtherance of the Request for Continued Examination filed herewith, Applicants respectfully request reconsideration of this Application and consideration of the foregoing amendment, which is hereby submitted in accordance with 37 C.F.R. §§ 1.114 and 1.116(a).

Upon entry of the foregoing amendment, claims 1-53 are pending in the application, with 1, 2, 8, 18, 21, 29, 32, 39, and 47 being the independent claims. Claims 1-3, 8, 9, 14, 19, 18, 21, 25, 29, 32, 39, 47, 52, and 53 are amended without prejudice to or disclaimer of any subject matter canceled therein. Support for these changes can be found on, inter alia, pages 65-71 (especially, page 66, lines 22-30, and page 70, lines 5-9) of the Specification, and FIGs. 19, 29 and 30 of the Drawings. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Personal Interview with Examiner

A personal interview was held on Tuesday, August 26, 2003, between Examiner Huynh-Ba, co-inventor Alex Holtz, and Applicants' representatives Michael Q. Lee (Registration No. 35,239), Kendrick Patterson (Registration. No. 45,321), and Molly McCall (Registration No. 46,126). Applicants would like to thank the Examiner for a helpful and constructive interview.

During the interview, Applicants' representatives explained the differences between the present application and the applied documents of record, namely U.S. Patent No. 6,038,573 to Parks (herein referred to as "Parks"). A recitation of differences are described in detail below with respect to the rejections under 35 U.S.C. § 102.

Applicants' representatives also discussed the Supplemental Declaration by Alex Holtz (filed on December 10, 2002). Applicants agreed to review the Supplemental Declaration to determine if modifications are required in light of the amendments made herein. Upon reflection, Applicants do not believe that the Declaration requires any modifications because the amended claims recite "integrating segment delimiters," This feature was not conceived until after December 18, 1997, as noted in the previously filed Supplemental Declaration (see Paragraph 19 of the Supplemental Declaration).

Rejections under 35 U.S.C. § 112

In the Office Action, the Examiner rejected claims 21-31 and 39-53 as allegedly being indefinite under 35 U.S.C. § 112, second paragraph. The Examiner objected to Applicants' usage of the expression "and/or" in claims 21, 29, 39, 47, 52, and 53. See Paper No. 13, page 2. Although Applicants respectfully disagree, these claims have been amended to remove this particular alternative expression. Applicants believe the Examiner's rejections are no longer valid and/or have been rendered moot by the proposed amendments. As such, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejections of the aforesaid claims, and allowance thereof.

Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1-3, 5, 6, 8-10, 14-19, 21, 27, 29, 32, 35, 36, 39, 40, 43, 44, 46, 47, and 51 under 35 U.S.C. § 102(e), as allegedly being anticipated by U.S. Patent No. 6,038,573 to Parks (herein referred to as "Parks"). Although Applicants respectfully disagree, Applicants believe the Examiner's rejections are no longer valid and/or have been rendered moot by the proposed amendments.

Referring to the independent claims (namely, claims 1, 2, 8, 18, 21, 29, 32, 39, and 47), Applicants have amended the claims to more clearly recite features that are not

taught by Parks. For example, with respect to claim 1, Parks does not describe a method or system for:

(a) executing a set of commands to automatically control a plurality of production devices to thereby produce a show, wherein said set of commands include at least one segment delimiter command, wherein step (a) comprises the step of **executing said at least one segment delimiter command in the course of executing said set of commands**, wherein execution of said at least one segment delimiter command results in identifying and categorizing a specific segment within said show...

Parks appears to describe a system that manages the workflow processes associated with a newsroom operation. (See Parks, Col. 2, lines 46-49). More specifically, Parks describes a markup language that manages the distribution of news story information to journalists, producers, directors, announcers, and other members of a production crew. (See Parks, Col. 1, lines 25-28; and Col. 6, lines 17-26). The news story information includes a news story document that can be stored at a server (Col. 6, lines 17-20), edited by an editor (Col. 6, line 63-67), or displayed on a teleprompter to be read by an announcer (Col. 8, lines 39-41). Hence, Parks appears to describe a system that allows a production crew (e.g., journalists, producers, directors, announcers) to edit a “prepackaged” video during the “pre-production” or “show-building process” for a news broadcast. (See Col. 6, lines 59-67; and Col. 7, lines 1-7). Unlike the claimed invention, Parks does not describe a system that “automatically controls a plurality of production

devices to thereby produce a show.” Parks also does not describe that a “segment delimiter command is executed during in the course of executing commands for automatically controlling the production devices, wherein execution of said at least one segment delimiter command results in identifying and categorizing a specific segment within said show.” In other words, the claimed invention identifies (and in the case of some embodiments, categorizes) segments of the show while the show is being produced. On the contrary, Parks describes a media management system for news documents that have already been produced and stored to a medium. (See Col. 6, lines 17-26).

As such, Applicants respectfully submit that Parks does not teach Applicants’ claimed invention. Accordingly, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection of the aforesaid claims, and allowance thereof.

Rejections under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 4, 7, 11-13, 20, 22-26, 28, 30, 31, 33, 34, 37, 38, 41, 42, 45, 48-50, 52, and 53 under 35 U.S.C. § 103, as allegedly not being non-obvious over one or more of the following documents: U.S. Patent No. 6,038,573 to Parks (herein referred to as “Parks”); and U.S. Patent No. 6,469,711 Foreman *et al.* (herein referred to as “Foreman”). Although Applicants respectfully

disagree, Applicants believe the Examiner's rejections are no longer valid and/or have been rendered moot by the proposed amendments.

As discussed above with reference to the rejections under 35 U.S.C. § 102, the independent claims have been amended to more clearly recite features not taught or suggested by Parks. Foreman does not cure the defects of Parks. Specifically, Foreman also does not teach or suggest "automatically controlling a plurality of production devices to produce a show." Nor does Foreman teach or suggest the "execution of segment delimiter commands during the course of executing commands to automatically control the plurality of production devices."

Therefore, the claims that depend from the independent claims are patentable over Parks and/or Foreman for at least the above cited reasons in addition to the additional features recited therein. As such, Applicants respectfully submit that neither Parks nor Foreman, alone or in combination, teaches or suggests the claimed invention. Accordingly, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection of the aforesaid claims, and allowance thereof.

Conclusion

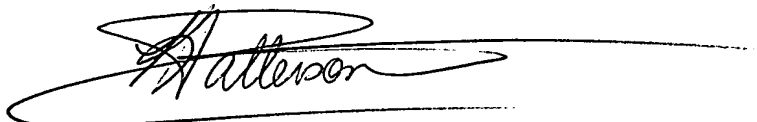
All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be

withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

A handwritten signature in black ink, appearing to read "K. Patterson", is written over a horizontal line. The signature is stylized with a large, sweeping loop at the end.

Kendrick P. Patterson
Attorney for Applicants
Registration No. 45,321

Date: August 28, 2003

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

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